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Of Counsel

10 November 2023

**VIA ECF**

Hon. Ellen L. Hollander, Judge  
United States District Court for the  
District of Maryland  
101 West Lombard Street  
Baltimore, Maryland 21202

RE: *United States v. Stanislav Yelizarov, et al.*  
*Case No. ELH-15-261*

Dear Judge Hollander:

Mr. Yelizarov is set for resentencing before Your Honor on December 8, 2023, at 1:30 p.m. Mr. Yelizarov asked me to provide his sentencing position in advance to the Court. I am not making a request for a specific sentence, rather simply advising the Court well before the hearing of what the defendant himself intends to present.

As the Court is aware from the 28 U.S.C. sec. 2255 hearing held before Your Honor on January 27 and February 22, 2022, the defendant maintains his innocence in this matter. He intends to present in his allocution that he was misled into agreeing to plead guilty before Judge Motz by his counsel, upon promises that no further indictment would be brought against him. As he stated in the 2255 hearing, his position is that prior counsel made assurances to him about the pending murder case and, absent those assurances, he would not have pled guilty in the robbery cases. He contends that the Government witnesses were not truthful in their statements to the Government and incriminated this defendant to save themselves from criminal jeopardy. He therefore asserts that the Court should not hold his guilty plea against him because he says it was invalid.

I have read the transcripts from the 2255 hearing and understand fully the Court's decision on that matter filed on June 3, 2022, ECF 517.

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Thank you for your consideration of this matter.

Very truly yours,

Richard Bardos, Of Counsel

RBB:rb  
Cc: AUSA Paul Budlow, via ECF